

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO SALES TAX FINANCING
CORPORATION,

Debtor.

PROMESA

Title III

No. 17 BK 3284-LTS

**MOTION SUBMITTING DECLARATIONS OF TIMOTHY DONAHUE AND PETER
HEIN IN SUPPORT OF OBJECTION OF THE GMS GROUP, LLC TO TITLE III PLAN
OF ADJUSTMENT OF PUERTO RICO SALES TAX FINANCING CORPORATION**

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Attorneys for The GMS Group, LLC

Dated: January 2, 2019

The GMS Group, LLC (“GMS” or “Secured Creditor”), respectfully shows the Court as follows:

1. On December 21, GMS filed an “Amended Objection Of The GMS Group, LLC To Second Amended Title III Plan Of Adjustment Of Puerto Rico Sales Tax Financing Corporation And Request For Evidentiary Hearing” with supporting exhibits (the “GMS Objection”). *See, Docket 4564.*

2. On December 28, 2018, Peter C. Hein filed the “Objection Of Individual COFINA Subordinate Bondholder Residing In The 50 States Who Purchased At The Original Offering Prices, To Confirmation Of Puerto Rico Sales Tax Financing Corporation (“COFINA”) Plan, And Response And Opposition To COFINA’s Thirteenth Omnibus Objection To Individual Claim No. 10701” (the “Hein Objection”). *See, Docket 4585.*

3. On December 31, 2018, GMS filed a joinder (the “GMS Joinder”) to the Hein Objection. *See, Docket 4587.*

4. On December 31, 2018, Hein transmitted by FedEx a supplement to the Hein Objection (the “Hein Supplement”), which was uploaded to the Court’s electronic docket on January 2, 2019. *See, Docket 4595.*

5. On January 2, 2019, GMS filed a joinder to the Hein Supplement (the “GMS Joinder to Hein Supplement”). *See, Docket 4605.*

6. In addition, based on consideration of the GMS Objection, the Hein Objection, the Hein Supplement and the GMS Joinder to the Hein Supplement, GMS hereby submits declarations from Timothy Donohue (*attached as Exhibit 1*) and from Peter Hein (*attached as Exhibit 2*) together with their respective Exhibits¹.

Dated: New York, New York

January 2, 2019

GODREAU & GONZALEZ LAW, LLC

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¹ Since the Hein Declaration Exhibits are voluminous (in excess of 1,200 pages), the Exhibits will be made available upon request by any party in interest.